

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SIDI MOUHAMED DEIDE, ADAMA SY,
ABDALLAHI SALEM, MOUHAMED SAID
MALOUM DIN, and JHONNY NEIRA, on
behalf of himself and a class of all others
similarly situated,

Plaintiffs,

v.

EDWIN J. DAY as Rockland County Executive;
STEVEN M. NEUHAUS as Orange County
Executive,

Defendants.

Case No. 23-cv-3954 (NSR) (VR)

**DECLARATION OF AMY BELSHER IN SUPPORT OF THE PLAINTIFFS'
OPPOSITION TO THE DEFENDANTS' MOTION TO DISMISS**

I, Amy Belsher, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney at the New York Civil Liberties Union Foundation and am admitted to practice law in the State of New York and before this Court.
2. I serve as counsel for the plaintiffs in this putative class action and am fully familiar with the facts and circumstances of this proceeding. I submit this declaration in support of the plaintiffs' opposition to the defendants' motion to dismiss.
3. Attached as **Exhibit 1** to this declaration is a true and correct copy of Rockland County's Declaration of a State of Emergency dated May 6, 2023.
4. Attached as **Exhibit 2** to this declaration is a true and correct copy of Orange County's Declaration of a State of Emergency dated May 8, 2023.

5. Attached as **Exhibit 3** to this declaration is a true and correct copy of the Orange County Executive Order No. 3 dated June 7, 2023.

6. Attached as **Exhibit 4** to this declaration is a true and correct copy of the Rockland County Emergency Order No. 3 dated June 14, 2023.

7. Attached as **Exhibit 5** to this declaration is a true and correct copy of a video of Steven Neuhaus posted to the Orange County Government Facebook page, title “County Executive Neuhaus Update: July 13, 2023, available at: <https://www.facebook.com/watch/?v=6331656683584364>.

8. Attached as **Exhibit 6** to this declaration is true and correct copy of a video of Steven Neuhaus posted to the Orange County Government Facebook page, title “County Executive Neuhaus Update: July 27, 2023, available at: <https://www.facebook.com/watch/?v=3222148151262417>.

9. Attached as **Exhibit 7** to this declaration is a true and correct copy of Rockland County Press Release titled “NYC Attempt To Alleviate Migrant Crisis By Exporting Homeless In Statewide Sleight Of Hand,” Sept. 27, 2023, available at: <https://rocklandgov.com/departments/county-executive/press-releases/2023-press-releases/nyc-attempt-to-alleviate-migrant-crisis-by-exporting-homeless-in/>.

10. Attached as **Exhibit 8** to this declaration is a true and correct copy of Rockland County Press Release titled “County Executive Sends Letter to Gov. Hochul Regarding NYC Court Filing About Migrant Crisis,” Aug. 25, 2023, available at: <https://rocklandgov.com/departments/county-executive/press-releases/2023-press-releases/county-executive-sends-letter-to-gov-hochul-regarding-nyc-court-/>.

11. I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 5, 2023
New York, N.Y.

/s/ Amy Belsher
Amy Belsher

CERTIFICATE OF SERVICE

I hereby certify that on October 5, 2023, I served by electronic email this declaration of Amy Belsher in support of the plaintiffs' opposition to the defendants' motion to dismiss upon the following counsel of record for the defendants in this case:

Matthew Parisi (MParisi@BPSlaw.com);
Vincent Crowe (VCrowe@bpslaw.com); and
David Chen (dchen@bpslaw.com).

Dated: October 5, 2023
New York, NY

/s/ Amy Belsher
Amy Belsher